UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND

Carline Vilbon
        Plaintiff(s)

v.

                                                    C.A. No. 1:21-CV-00267-MSM-LDA

The Department of Children, Youth and
Families; The Lifespan Facilities and The
Rumford House Group Home
        Defendant(s)

**RESPONDENTS, THE LIFESPAN FACILITIES' AND THE RUMFORD HOUSE'S,
OBJECTION TO PETITIONER, CARLINE VILBON'S MOTION FOR DEFAULT
JUDGMENT**

Respondents, The Lifespan Facilities and The Rumford House ("Respondents"), file this

objection to Petitioner, Carline Vilbon's ("Petitioner"), Motion for Default Judgment.   After the

Petitioner filed the application for habeas corpus in this case, a Court Order issued on August 20,

2021, requiring that a responsive pleading be submitted in the case by the State of Rhode Island

Attorney General's Office. The Order did not require a response from these Respondents.

Nevertheless, these Respondents filed a response to address the allegations in the application for

habeas corpus and to provide information believed to be helpful to the Court.

Petitioner's Motion for Default is not substantiated and therefore should be denied.

Respondents,
The Lifespan Facilities and The Rumford
House,

By Their Attorney(s),

    /s/ John D. Plummer

John D. Plummer (#7445)
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CERTIFICATION

I hereby certify that, on the 5th day of October, 2021,

[X]   I served this document through the electronic filing system on the following parties:

Carline Vilbon
74 Prince Street
Pawtucket, Rhode Island 02860

The document electronically served is available for viewing and/or downloading from the Rhode Island Judiciary's Electronic Filing System.

[X]   I caused this document to be [X] mailed and [X] emailed to the attorney for the opposing party (and/or the opposing party if self-represented) whose name(s) and address(es) are as follows:

Carline Vilbon
74 Prince Street
Pawtucket, Rhode Island 02860
vilbonc@yahoo.com

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JDP:slh
40-1057
(3733547)

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